

# Projection of U.S. Coal-Fired Power Plants Potentially Impacted by Excess SO<sub>3</sub> Emissions

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## Summary

This presentation provides a projection of U.S. coal-fired power plants that potentially will be impacted by excess sulfur trioxide (SO<sub>3</sub>) emissions and the resultant need for development of cost-effective technologies for control of SO<sub>3</sub> emissions. Fly ash and condensed SO<sub>3</sub> emissions are the major components in combustion flue gas that contribute to stack opacity. SO<sub>3</sub>-related stack opacity problems will become more prevalent as additional coal-fired power plants are retrofit with pollution control equipment to meet future sulfur dioxide (SO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>) emission control requirements. It is estimated that 75 to 85% of bituminous coal-fired plants with selective catalytic reduction (SCR) and/or wet flue gas desulfurization (FGD) controls are likely to have sufficiently high levels of stack SO<sub>3</sub> emissions to experience excess stack opacity. Fortunately, subbituminous and lignite-fired plants are not expected to have the same problem as bituminous-fired plants.

The primary motivation for this assessment is a concern that recent stack opacity problems appear to be associated with coal-fired power plants that have been retrofit with SCR and/or wet FGD controls. Particulate matter (PM) emissions in the combustion flue gas from coal-fired power plants consist primarily of fly ash particles that are not captured by the particulate control device, wet FGD slurry carryover solids, and condensable sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) aerosols. The H<sub>2</sub>SO<sub>4</sub> is a product of the reaction of SO<sub>3</sub> and water that occurs as the flue gas cools across the air preheater. Plants burning medium to high sulfur coal that are equipped with wet FGD systems are particularly prone to experiencing stack opacity problems associated with the emission of H<sub>2</sub>SO<sub>4</sub>. The reason for this is that the gaseous H<sub>2</sub>SO<sub>4</sub> is condensed to an aerosol mist entering the wet FGD system, but unlike SO<sub>2</sub>, is not readily removed. Most reports indicate a maximum H<sub>2</sub>SO<sub>4</sub> removal efficiency of 50% for wet FGD absorbers. Based on industry convention, the H<sub>2</sub>SO<sub>4</sub> will be referenced as SO<sub>3</sub> throughout the remainder of this paper.

Stack SO<sub>3</sub> emissions from coal-fired power plants are extremely variable and can range from less than one ppm to over 30 ppm. While SO<sub>3</sub> emissions are not directly regulated, being a component of PM could result in their need for control to meet stack opacity limits. Whether a particular level of SO<sub>3</sub> emissions is considered a problem or not is dependent on numerous plant specific factors. Such factors as flue gas exit temperature; the particulate, NO<sub>x</sub>, and SO<sub>2</sub> pollution control equipment configuration and performance; stack diameter; and ambient weather conditions, can all influence the tolerable level of SO<sub>3</sub> emissions. The most notable example of excessive SO<sub>3</sub> aerosol emissions contributing to a stack opacity problem is American Electric Power's (AEP) Gavin Plant where the installation of a NO<sub>x</sub> SCR doubled the SO<sub>3</sub> emissions which resulted in a "blue plume".

The potential amount of existing coal-fired power plant capacity equipped with wet FGD that is most likely to experience SO<sub>3</sub>-related stack plume opacity problems can be estimated based on fuel sulfur content and a few assumptions regarding the production and capture of SO<sub>3</sub> as the flue gas passes from the furnace to the stack. For this analysis, it was assumed that wet FGD plants with a stack SO<sub>3</sub> concentration greater than 5 ppm could experience stack plume opacity problems. A 5 ppm SO<sub>3</sub> upper limit may be a slightly conservative assumption. Stack diameter is also a major variable affecting opacity measurement and a small plant with corresponding small stack diameter could possibly tolerate a larger concentration of SO<sub>3</sub> without exceeding opacity limits. Cumulative distribution curves of coal sulfur content for plants equipped with wet FGD were used to project the percentage of affected wet FGD plant capacity with greater than 5 ppm stack SO<sub>3</sub> emissions. The SO<sub>3</sub> production and capture assumptions are as follows: 1) furnace conversion of SO<sub>2</sub> to SO<sub>3</sub> at 1%, 0.055%, and 0.1% for bituminous, subbituminous, and lignite respectively; 2) air preheater SO<sub>3</sub> capture at 20%; 3) electrostatic precipitator (ESP) SO<sub>3</sub> capture at 15%; and 4) wet FGD SO<sub>3</sub> capture at 15%. Based on this analysis, the average stack SO<sub>3</sub> concentration is 10 ppm for bituminous-fired plants with wet FGD and approximately 75% of these plants are estimated to exceed a 5 ppm stack SO<sub>3</sub> concentration compared to 0% for subbituminous and lignite plants.

A similar analysis was conducted assuming that all of the wet FGD coal-fired power plants are also retrofit with NO<sub>x</sub> SCR. The same assumptions are used as above for the wet FGD analysis, except there is an additional 1% conversion of SO<sub>2</sub> to SO<sub>3</sub> across the SCR catalyst for bituminous coal-fired plants. The impact of SCR-related SO<sub>3</sub> emissions for subbituminous and lignite plants is assumed to be negligible as a result of SO<sub>3</sub> adsorption by the alkaline fly ash. With the retrofit of NO<sub>x</sub> SCR, the estimated average stack SO<sub>3</sub> concentration increases to 19 ppm for bituminous-fired plants with wet FGD and approximately 85% of the plants are estimated to exceed a 5 ppm stack SO<sub>3</sub> concentration.

The use of FGD and SCR at coal-fired power plants will increase significantly over the next 15 years due to implementation of the U.S. Environmental Protection Agency's (EPA) Clean Air Interstate Rule (CAIR), which establishes a market-based allowance cap-and-trade program to permanently cap emissions of SO<sub>2</sub> and NO<sub>x</sub> in 28 eastern U.S. states and the District of Columbia. The emission reductions will be implemented in two phases, with a Phase I compliance date of January 1, 2009 for NO<sub>x</sub>, January 1, 2010 for SO<sub>2</sub>, and a Phase II compliance date of January 1, 2015 for both NO<sub>x</sub> and SO<sub>2</sub>. To comply with the stringent SO<sub>2</sub> regulations proposed in CAIR, many coal-fired power plants will be required to install FGD technologies. EPA estimates that by year 2020 the total FGD capacity is projected to increase from the current 100 gigawatts (GW) to 231 GW. More importantly, the majority of this additional FGD capacity will likely use wet FGD technologies. In addition, EPA has estimated that a total of approximately 154 GW of SCR will have been installed on U.S. coal-fired power plants by 2020 for compliance with the NO<sub>x</sub> SIP call and CAIR. This dramatic increase in the use of wet FGD and SCR controls will further exacerbate the problem of excess SO<sub>3</sub> emissions in the future and requires the development of cost-effective technologies for control of SO<sub>3</sub> emissions.